

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 20-51-CFC
	:	
JOANNA CRANE,	:	
	:	
Defendant.	:	

DEFENDANT'S UNOPPOSED MOTION TO
CONTINUE TRIAL

Defendant, Joanna Crane, through Defense counsel, Janet Bateman, Assistant Federal Public Defender, hereby moves this Court for an Order continuing the trial and to schedule a status conference instead in 60 days. In support of the motion, the defense submits as follows:

1. On August 25, 2020, Ms. Crane was charged in a one-count Indictment with wire fraud, in violation of 18 U.S.C. § 1343.
2. On September 3, 2020, Ms. Crane had an Initial Appearance before United States Magistrate Judge, Mary Pat Thyng.
3. Trial is currently scheduled for February 17, 2021.
4. Undersigned counsel has just been assigned to represent Ms. Crane. *See* D.I. 12. Counsel requires time to review the discovery and to meet and discuss the matter with Ms. Crane, including the possibility of a non-trial resolution. Should Ms. Crane elect to proceed to trial, counsel will require time beyond the current February 17 trial date to prepare.
5. Accordingly, the defense requests that the trial date be continued and suggests that a status conference be scheduled for approximately 60 days to take up the matter of rescheduling, if necessary.

6. Assistant United States Attorney Maureen McCartney has indicated that the Government does not oppose this motion. The defense has no objection to excluding under the Speedy Trial Act (18 U.S.C. § 3161, et seq.).

WHEREFORE, for the above-stated reasons and any other such reasons that shall appear to the Court, it is respectfully requested that the trial date be continued and that a status conference be set.

Respectfully submitted,

By: /s/ Janet Bateman
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Dated: January 11, 2021

Counsel for Joanna Crane